

Law Offices

**HOLLAND & KNIGHT LLP**

2099 Pennsylvania Avenue N.W.  
Suite 100  
Washington, D.C. 20006-6801

202-955-3000  
FAX 202-955-5564  
www.hklaw.com

**ORIGINAL****RECEIVED**

November 27, 2002

NOV 27 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**CHARLES H. NAFTALIN**  
202-457-7040  
cnaftalin@hklaw.com

Annapolis	New York
Atlanta	Northern Virginia
Bethesda	Orlando
Boston	Portland
Bradenon	Providence
Chicago	St. Petersburg
FL Lauderdale	San Antonio
Jacksonville	San Francisco
Lakeland	Seattle
Los Angeles	Tallahassee
<b>Melbourne</b>	Tampa
Miami	West Palm Beach
International Offices	São Paulo
Caracas*	Tel Aviv
Helsinki	Tokyo
Mexico City	
Rio de Janeiro	* Representative Office

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: ALASCOM, INC. TARIFF F.C.C. NO. 11;  
CC DOCKET NO. 95-182**

Dear Secretary Dortch:

Enclosed for filing are an original and four (4) copies of Alascom, Inc.'s Statement regarding its annual Tariff F.C.C. No. 11 filing in the above-referenced docketed proceeding. Concurrent with this paper filing, we have filed a duplicate on the Electronic Comment Filing System under the above-referenced proceeding.

Very truly yours,

HOLLAND &amp; KNIGHT LLP



Charles R. Naftalin

Holly R. Smith

*Counsel for Alascom, Inc.*

Enclosure

cc: Judith A. Nitsche, Chief, Tariff and Pricing Analysis Branch  
Qualex International

014

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**RECEIVED**

**NOV 27 2002**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of )  
 )  
Investigation of Alascom, Inc. )  
Interstate Transport and ) CC Docket No. 95-182  
Switching Services )  
 )  
Alascom, Inc., FCC Tariff No. 11 )

**STATEMENT OF ALASCOM, INC.**

Alascom, Inc. ("Alascom"), by its attorneys, hereby submits this Statement in lieu of the annual rate revisions to Alascom's Tariff No. 11 which the Commission generally contemplates would be submitted at this time.<sup>1</sup>

After review of the available data, at this time Alascom is unable to determine whether changes to its investments, expenses and operations, since the submission of its most recent rate revisions to Tariff No. 11, would be sufficient to warrant rate revisions now for 2003.<sup>2</sup> As Alascom has indicated to the Commission before, the annual revision process under Tariff No. 11 is burdensome. Alascom submits that undertaking the cumbersome process to revise them now would be wasteful of its resources and those of the

---

<sup>1</sup> See *Integration of Rates and Services for the Provision of Communications by Authorized Common Carriers between the Contiguous States and Alaska, Hawaii, Puerto Rico and the Virgin Islands*, 9 FCC Rcd 3023 (1994) (*Alascom MO&O*) (adopting *Alaska Joint Board Final Recommended Decision*, 9 FCC Rcd 2197 (Joint Board 1993) (*Final Recommended Decision*)) (recommending annual tariff filing at ¶ 143)); see also 47 C.F.R. § 61.58(e)(3).

<sup>2</sup> Alascom Transmittal No. 1260 to Tariff No. 11, filed November 27, 2001

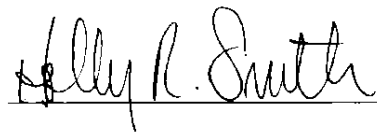
Commission's staff. Indeed, more than two years ago Alascom proposed to cap Tariff No. 11 rates.<sup>3</sup>

In addition, in adopting the Tariff No. 11 process years ago, the Commission foresaw that annual revisions might become unnecessary.<sup>4</sup> Alascom relies on that guidance here.

Therefore, Alascom respectfully requests that the Commission accept the instant Statement in lieu of a current annual rate revision to its Tariff No. 11.

Respectfully submitted,

ALASCOM, INC.

By: 

Charles R. Naftalin  
Holly R. Smith  
Holland & Knight LLP  
2099 Pennsylvania Avenue, NW  
Suite 100  
Washington, DC 20006-6801  
(202) 955-3000

November 27, 2002

Its Attorneys

---

<sup>3</sup> See *AT&T Corp. and Alascorn Inc. Petition for Elimination of Conditions*, CC Docket No. 00-46 (filed March 10, 2000).

<sup>4</sup> See *Final Recommended Derision*, at ¶ 143

**CERTIFICATE OF SERVICE**

I, Marianne C. Trana, a legal secretary in the firm of Holland & Knight LLP, hereby certify that on the 27th day of November, 2002, copies of the foregoing Statement of Alascom, Inc. were deposited in the U.S. Mail, postage prepaid, to the following:

Joe D. Edge  
Tina M. Pidgeon  
Drinker Biddle & Reath, LLP  
1500 K Street, NW, Suite 1100  
Washington, DC 20005  
Counsel for General  
Communication. Inc

Elizabeth H. Ross, Esq.  
Birch, Horton, Bittner  
and Cherot  
1150 Connecticut Avenue, NW  
Suite 1200  
Washington, DC 20036  
Counsel for ACS Long-Distance

Judith A. Nitsche \*  
Chief, Tariff and Pricing Analysis  
Branch  
Federal Communications  
Commission  
445 Twelfth Street, SW  
Room 5A207  
Washington, DC 20554

Qualex International\*  
445 12th Street, SW  
Room CY-B402  
Washington, D.C., 20554

\*via hand delivery

  
Marianne C. Trana

I, Marianne C. Trana, certify that the FCC Registration Number (FRN) listed below is true and correct to the best of my knowledge, information and belief

0	0	0	1	-	5	7	2	6	-	7	6
---	---	---	---	---	---	---	---	---	---	---	---

[illegible]